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7      *Attorneys for Defendant Solo World Partners, LLC*8      **UNITED STATES DISTRICT COURT**9      **STATE OF NEVADA**

10     ELLEN REEVES,

11     Plaintiff,

12     v.

13     DISCOVER YOUR MOBILITY, INC.; SOLO  
14     WORLD PARTNERS, LLC, et al.

15     Defendants.

**Case No. 2:22-cv-01361-GMN-DJA****JOINT STIPULATION AND ORDER  
FOR EXTENSION OF ALL  
DEADLINES****(FIFTH REQUEST)**

16        Defendant Solo World Partners, LLC (“Solo”) and Plaintiff Ellen Reeves (“Plaintiff”), and  
 17        Defendant Discover Your Mobility, Inc. (“Discover”) (collectively the “Parties”), by and through  
 18        their respective counsel of record, hereby respectfully submit this Joint Stipulation to Extend all  
 19        deadlines by an additional sixty (60) days. This is the fourth request to extend deadlines in this  
 20        matter. The Parties have agreed to the extension for the reasons set forth below:

21                          **PROCEDURAL BACKGROUND**

22        Plaintiff filed her Amended Complaint in this case on January 29, 2024. (ECF No. 26.)  
 23        Defendant Discover Your Mobility, Inc. filed their Answer to the Amended Complaint on February  
 24        12, 2024 (ECF No. 32) and Defendant Solo World Partners, LLC filed their Answer to the Amended  
 25        Complaint on March 22, 2024 (ECF No. 35). On June 4, 2024, the Court issued an order granting  
 26        the Renewed Discovery Plan and Scheduling Order (ECF No. 40.).

27        Since that time, the parties, have exchanged written discovery, Plaintiff made Third  
 28        Supplemental Disclosures, and Defendant Solo made its First Supplemental Disclosures.

1 The Plaintiff's deposition was originally set to occur prior to the close of discovery.  
2 However, due to difficulties in travel schedules for the deposition and respective counsel, the  
3 Parties have agreed that Plaintiff's deposition will be taken on December 20, 2024. However, that  
4 date is after the currently set deadline for discovery.

## **GOOD CAUSE TO EXTEND DISCOVERY**

6 All parties are actively engaging in discovery. However, based upon recent document and  
7 witness disclosures, the parties need additional time to complete the discovery process. The parties  
8 will continue to ensure that relevant information is obtained and exchanged in a timely manner.

9        The Parties have stipulated and agreed to extend all deadlines by an additional sixty (60)  
10 days as set forth below. This extension will ensure that the case continues to progress smoothly,  
11 and to allow both sides to address issues that may arise between them. For these reasons, this  
12 stipulation is made for good cause and not for any improper motive or to cause unnecessary delay.

13 The Parties hereby stipulate and agree to the following proposed deadlines in this case:

	<b>Event</b>	<b>Existing Deadline</b>	<b>Proposed New Deadline</b>
14	Discovery Cutoff	November 18, 2024	January 17, 2025
15	Dispositive Motion Deadline	December 16, 2024	February 17, 2025
16	Joint Proposed Pretrial Order	January 17, 2025	March 18, 2025

<sup>19</sup>\*the 60-day deadline fell on a weekend so deadline moved to next court day

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If dispositive motions are filed, the deadline for filing the joint pretrial order will be suspended until 30 days after decision on the dispositive motions or further court order.

**IT IS SO STIPULATED AND AGREED.**

DATED: this 14th day of October, 2024.

**DICKINSON WRIGHT PLLC**

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**IT IS SO ORDERED.**

  
**UNITED STATES MAGISTRATE JUDGE**

DATED: 11/19/2024